

AMENDMENTS TO THE DRAWINGS

Applicant requests that the drawings filed on February 20, 2004 be replaced by the replacement sheets enclosed herein.

REMARKS

Claims 1-20 are pending in the application. Claims 1-20 and claims 6-20 have been rejected by the Examiner. Claim 5 has been objected to by the Examiner. The Examiner also objects to the drawings. The Examiner's objections and rejections are addressed below in substantially the same order as in the office action.

OBJECTIONS TO THE DRAWINGS

The Examiner objects to the drawings as failing to comply with 37 CFR 1.84(p)(4) because reference character "76" has been used to designate both the shroud and the lower lateral fluid ports. Applicant has revised the drawings to designate the shroud with numeral 80 to correct the Examiner's noted drawing error.

The Examiner objects to the drawings because the plug "120" of figures 7-11 is not retained in the valve mechanism upon removal as described in the specification (paragraph 42.) Applicant has corrected the Figs. 7-11 to show proper placement of the plug "120". Applicant corrected Figs. 7-11 are now believed to be consistent with the "as-filed" informal drawings, which did show the plug "120" retained in the valve mechanism upon removal as described in the specification.

The Examiner objected to the drawings as failing to comply with 37 CFR 1.84(p)(5) because they do not include the following reference sign(s) mentioned in the description "80". Applicant has revised the drawings to designate the shroud with numeral 80 to correct the Examiner's noted drawing error.

REJECTIONS UNDER 35 USC § 103

Claims 1-3, 8, 10, 11, 15-17 and 19 stand rejected under 35. U.S.C. 103(a) as being unpatentable over Cherry et al. in view of Evans et al. The Examiner contends that Cherry et al. (Figures 1-3) discloses a reservoir completion assembly for selective production of production fluid from a lower completion section formed of tubing string and a packer device for securing the lower completion section within the wellbore section of a wellbore. In part, the Examiner further contends that:

The reservoir control valve has a control valve body with an anchor portion for selectively landing the control valve body into a packer within the wellbore. It also has a fluid flow port (85) disposed within the valve body. There is a first slidable sleeve member that is moveable between an open position, wherein fluid communication through the port is not blocked by the first sleeve member, and a closed position wherein fluid communication through the port is blocked by the first sleeve member. And a second valve member that is moveable between an open position, where in the second valve member does not block fluid communication through the port, and a closed position, wherein fluid communication through the port is blocked by the second valve member...

Applicant respectfully submits that the Examiner has mischaracterized the system shown in Cherry et al. Applicant concurs that Cherry et al. shows two valves 81, 75. However, each valve leads to a separate fluid conduit. The sliding sleeve valve 81 opens the port 85 leading to fluid conduit 53. The flapper valve 75 opens the bore 62 leading to fluid conduit 54. Each valve 81, 75 opens and closes fluid communication to a different port. Therefore, contrary to the Examiner's above noted contention, valve 75 does not selectively block fluid communication through fluid port 85.

With respect to claims 1, 8 and 15, Cherry et al. clearly does not shown two valves that control fluid flow through the same port. Additionally, Applicant has found no teachings in Evans et al, Fredd, Scarsdale or Cochran that teach or suggest such an arrangement. Accordingly, Applicant respectfully submits that independent claims 1, 8 and 15 are in condition for allowance. Claim 15 has been amended to clarify the relationship of the valves to the port.

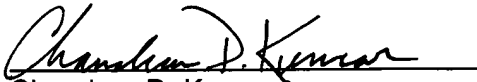
With respect to claims 2-7, 9-14 and 16-20, these claims depend from a claim believed to be in condition for allowance and should be allowable on at least those grounds.

CONCLUSION

For all the foregoing reasons, Applicant submits that the application is in a condition for allowance. No fee is believed due for this paper. The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. **02-0429 (284-37042-US)**

Respectfully submitted,

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CERTIFICATE OF TRANSMISSION/ MAILING

I do hereby certify that this correspondence is being facsimile transmitted to the USPTO via facsimile no. 571.273.8300 or deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to the Commissioner for Patents, Examiner **Daniel P. Stephenson**, on this 16th day of December, 2005.


Margaret A. Pruitt